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**From:** Kaur, Supinderjit [Kaur.Supinderjit@epa.gov]  
**Sent:** 6/27/2018 2:56:17 PM  
**To:** Donovan, Betsy [Donovan.Betsy@epa.gov]  
**Subject:** RE: RKL FS Comments

That sounds good, I just wanted to bring this email back up, so we can get some feedback on these comments.

My schedule for today is open.

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**From:** Donovan, Betsy  
**Sent:** Wednesday, June 27, 2018 10:55 AM  
**To:** Kaur, Supinderjit <Kaur.Supinderjit@epa.gov>  
**Subject:** RE: RKL FS Comments

A few notes... we have FWS comments and need to talk about how to deal with them.... And we don't have NJDEP comments yet... I may have time later this afternoon to discuss FWS comments, say after 2:30...

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**From:** Kaur, Supinderjit  
**Sent:** Wednesday, June 27, 2018 10:43 AM  
**To:** Vaughn, Stephanie <Vaughn.Stephannie@epa.gov>; Donovan, Betsy <Donovan.Betsy@epa.gov>; Sivak, Michael <Sivak.Michael@epa.gov>; Fajardo, Juan <Fajardo.Juan@epa.gov>; Griffiths, Rachel <griffiths.rachel@epa.gov>; Clemetson, Michael <Clemetson.Michael@epa.gov>  
**Subject:** RE: RKL FS Comments

Are these FS comments good to send out to Geosyntec?

Thank you

Supinder

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**From:** Kaur, Supinderjit  
**Sent:** Wednesday, June 20, 2018 5:37 PM  
**To:** Vaughn, Stephanie <Vaughn.Stephannie@epa.gov>; Donovan, Betsy <Donovan.Betsy@epa.gov>; Sivak, Michael <Sivak.Michael@epa.gov>; Fajardo, Juan <Fajardo.Juan@epa.gov>; Griffiths, Rachel <griffiths.rachel@epa.gov>; Clemetson, Michael <Clemetson.Michael@epa.gov>  
**Subject:** RKL FS Comments

Hi everyone,

Attached are the comments for Rolling Knolls revised FS (excluding comments on Appendix B & C). Please take a look and let me know if you would like any changes.

Juan – for general comment 1 “The ARSs were developed as site-specific PRGs and would replace the applicable chemical-specific ARARs. For the evaluation of chemical specific ARARs for Alternatives 3, 4, and 5, provide a detailed discussion on how the PRGs would be met and how capping/excavating 25 acres, remediation of APCs, and vegetative covers would eliminate exposure pathways.” Is the language okay?

Michael S – Is the proposed language for specific comment 10 accurate? “The text says that dioxin-like PCBs were determined to be the primary risk driver at the Site. Please change this to “dioxin-like PCBs were determined to be the primary risk driver at the Site, and the only risk drivers for human health for the trespasser scenario.”

Stephanie – Is the wording for comment 36 (below) sufficient? It's the one on the tables comparing soil and groundwater alternatives.

In tables 6-1 (comparative analysis of soil remedial alternatives) and 7-1 (comparative analysis of groundwater remedial alternatives), all evaluation criteria are evaluated and compared with the same numerical ranking of poor, moderate, good, and excellent. Threshold criteria and balancing criteria should not have the same categorization or comparison. Please make the following changes to the tables:

- For threshold criteria, change the grading to either “meets NCP criterion” or “does not meet NCP criterion”. The alternatives either comply with protection of human health and environment and compliance with ARARs or do not meet them. These criteria should not be described as poor, excellent, or somewhere in-between.
- Instead of using the numerical ranking mentioned above, for all balancing criteria except cost, change grading to the following (including the descriptions in the notes):
  - o Poor – alternative is expected to perform poorly against criterion
  - o Moderate - alternative is expected to perform moderately well against criterion
  - o High – alternative is expected to perform very well against criterion
- For cost balancing criteria, remove any grading or classification. Only keep the dollar amount value/total cost in these tables.
- Include a row for each alternative that states the approximate time it would take to achieve the RAOs (This would be useful, not sure if it is necessary, thoughts?)

In addition to the comparative analysis tables for the soil and groundwater alternatives, please include detailed tables in the FS that describe and summarize how the respective alternatives rank against evaluation criteria from Section 6 and 7. (Is this descriptive enough of what they would need to do? Or should the comment be more precise, also a more detailed table would be more useful, however would it be asking them to do extra work?)

Thank you!!

Supinder

***Supinderjit Kaur***

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